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Attorneys for Defendants
CITY OF SACRAMENTO, SACRAMENTO
POLICE DEPARTMENT, and DANIEL HAHN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

DANIEL GARZA, JOSHUA RUIZ, ELISABETH
CROUCHLEY, STEVEN PASSAL, RUSSELL
VREELAND, ANTHONY PIRES, JOHN
RUFFNER, and JENNIFER LORET DE MOLA,

Plaintiffs,

vs.

CITY OF SACRAMENTO, SACRAMENTO
POLICE DEPARTMENT, DANIEL HAHN,
and DOE 1 to 225,

Defendants.

Case No. 2:20-cv-01229-WBS-JDP

**PLAINTIFFS DANIEL GARZA'S
STIPULATION OF DISMISSAL,
WITHOUT PREJUDICE**

1 Plaintiff Daniel Garza and Defendants City of Sacramento, Sacramento Police Department,
2 Daniel Hahn STIPULATE to DISMISS the remaining claims and defenses, WITHOUT PREJUDICE,
3 pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

4 This stipulation for dismissal is made without prejudice to Plaintiff Daniel Garza re-filing each of
5 his individual claims and causes of action asserted in this federal court action in a state court action,
6 wherein Defendants agree not to seek removal to federal court pursuant to 28 U.S.C. § 1441(c), or any
7 other provision.

8 This stipulation for dismissal results in the dismissal of all claims and defenses asserted in this
9 federal court action because the remaining parties and claims were dismissed in a separate stipulation,
10 ECF No. 30. Accordingly, the Court may now close this case.

11 IT IS SO STIPULATED.

12 Dated: January 31, 2023

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

15 By: _____
Mark E. Merin
Paul H. Masuhara

17 Attorneys for Plaintiffs
DANIEL GARZA, JOSHUA RUIZ,
18 ELISABETH CROUCHLEY, STEVEN PASSAL,
RUSSELL VREELAND, ANTHONY PIRES,
19 JOHN RUFFNER, and JENNIFER LORET DE MOLA

20 Dated: January 31, 2023

Respectfully Submitted,
CITY OF SACRAMENTO

/s/ Chance L. Trimm
(as authorized on January 31, 2023)

23 By: _____
Chance L. Trimm

25 Attorney for Defendants
CITY OF SACRAMENTO, SACRAMENTO
26 POLICE DEPARTMENT, and DANIEL HAHN